



Western Pacific Med Corp

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January 29, 2015

Angela Garner, Deputy Director
Division of State Demonstrations and Waivers
Center for Medicaid and CHIP Services, CMS
7500 Security Boulevard, Mail Stop S2-01-16
Baltimore, Maryland 21244-1850

Re: Proposed California Amendment to Bridge to Health Reform
Demonstration No. 11-W-00193/9
Drug Medi-Cal Organized Delivery System Waiver

Dear Ms. Garner:

I respectfully submit the following comments and concerns related to the California Department of Health Care Services' proposed amendment to the California Bridge to Health Reform, 1115 Waiver.

Western Pacific operates narcotic treatment programs in California. We currently have over 2,600 patients enrolled in treatment for opioid dependency throughout Los Angeles, Orange and Ventura County. We have provided narcotic replacement therapy for over thirty-five years and have successfully assumed the operations of multiple California County administered narcotic treatment programs at their request. We value the long established relationships with the counties in which we serve and greatly appreciate their advocacy for the narcotic treatment program modality.

While we agree that many of the waiver proposals will benefit the substance use disorder patient population, there is a major application that is of deep concern to our patients and our organization as a provider. Specifically, we are concerned

with freedom of choice and reasonable promptness for Medi-Cal beneficiaries. As proposed, the waiver will allow restrictions to be placed upon patients in opioid withdrawal seeking immediate treatment. Regardless of the beneficiary protections proposed by the California Department of Health Care Services, access to life saving medical treatment will be reduced. Our concerns are based on actual experience at a time prior to the Sobky v. Smoley court ordered injunction that implemented and assured immediate access to all qualified Medi-Cal beneficiaries.

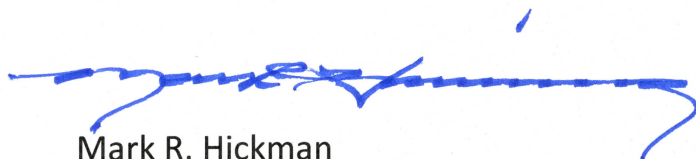
Prior to the injunction, freedom of choice and reasonable promptness protections were waived. This resulted in thousands of Medi-Cal beneficiaries being placed on a waiting list, many of whom died waiting for treatment.

Narcotic treatment programs provide life-saving medical services to individuals in need. Any delay in access to treatment will have an immediate negative impact on emergency medical services, criminal justice and public safety.

Again, we do support many of the proposals of the waiver, but urge the Centers for Medicare and Medicaid Services to exempt any application to narcotic treatment programs.

Thank you for your time and consideration, and if I can provide further information, please contact me at (818) 956-3737 or mark@westpacmed.com

Sincerely,



Mark R. Hickman
President & CEO